

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL : MDL No. 2804
PRESCRIPTION OPIATE : CASE NO. 17-MD-2804
LITIGATION : (DAP)
:

SECOND SUPPLEMENTAL EXPERT REPORT OF
CRAIG J. MCCANN, PH.D., CFA
April 15, 2019

Defendants which ultimately led to opioid transactions with Dispensers in Cuyahoga County and Summit County.

5. I have now been asked by Counsel to document how I further processed and validated opioid transaction data produced by the DEA, to attribute transactions with Dispensers to Manufacturers in this Second Supplemental McCann Report.²

6. I have been asked to summarize transactions in the ARCOS Data, especially those transactions into Cuyahoga County and Summit County attributable to Manufacturer Defendants.

7. I have also been asked to report the results of applying certain algorithms to the ARCOS Data attributable to Manufacturer Defendants.

II. Summary of Opinions

8. I previously concluded that the ARCOS Data produced by the DEA reflecting opioid shipments from January 2006 through December 2014 is reliable. I further concluded that the transaction records produced in discovery by the Distributor Defendants other than AmerisourceBergen are a reliable source of transactions data before 2006 and after 2014 for the varied time periods covered by the Distributor Defendants' transactions productions.

9. In the next section, I explain how the ARCOS Data can be used to identify the Manufacturer for virtually all the transactions in the ARCOS Data. In Section IV and Section V, I report the results of attributing

² On April 3, 2019, I filed a brief supplemental report (the "McCann Supplemental Report") to insert some Figures and Tables which had been inadvertently excluded from the McCann Report.

transactions flagged by a non-exhaustive set of algorithms applied to the ARCOS Data in the McCann Report to Manufacturer Defendants.

III. Attributing Transactions With Dispensers to Manufacturers

A. ARCOS Data

1. NDC Labeler Field

10. Drug packages are uniquely identified in the ARCOS Data by a National Drug Code, or NDC. The NDC has three segments, the first of which identifies the drug product's Labeler which is typically but not always the drug's Manufacturer.³ For example, 00603-3882-28 identifies hydrocodone/acetaminophen tablets manufactured by Par Pharmaceutical.

11. There are 23,280 unique NDCs in the ARCOS Data and 1,991 unique NDCs in transactions with Dispensers in Cuyahoga County and Summit County. There were 1,462,630 opioid transactions to Dispensers in Cuyahoga County from 2006 to 2014 containing 465,121,322 dosage units and 8,553,177,070 MME.⁴ There were 823,049 opioid transactions to Dispensers in Summit County from 2006 to 2014 containing 275,807,920 dosage units and 5,158,182,360 MME.⁵

12. Each record for the 2,285,679 transactions to Dispensers in Cuyahoga County and Summit County from 2006 to 2014 includes an NDC code.⁶

³ "NDC Dictionary Instructions," Drug Enforcement Administration, October 2010. Current version available at <https://www.deadiversion.usdoj.gov/arcos/ndc/readme.txt>.

⁴ See McCann Report, §VIII.A, Table 16.

⁵ See McCann Report, §VIII.B, Table 20.

⁶ From this point forward, my analysis deals with twelve non-treatment opioids.